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VICE PRESIDENT
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September 27, 1990

Mr. Andrew Park
New Jersey Facilities Section
Hazardous Waste Facilities Branch
United States Environmental Protection Agency
Region II, Jacob K. Javits Federal Building
New York, NY 10278

Supplemental Information
Solid Waste Management Units
Lenox China
Pomona, New Jersey

Dear Mr. Park:

Lenox, Incorporated has assembled the attached information regarding questions posed during our discussions concerning potential Solid Waste Management Units (SWMU) at our Lenox China facility in Pomona, New Jersey. In keeping with the numbering order detailed in the draft HSWA permit, the following will describe supplemental information included in this submission:

1. Sludge Degreaser Area - As discussed, any releases from the sludge degreaser pit will be captured as part of our TCE Plume Remediation Project that is being overseen by the New Jersey Department of Environmental Protection (NJDEP). The current status of this project is that we have finished plans and specifications for the pump and treat facilities and have submitted these to the NJDEP requesting a treatment works approval.
2. Sludge Disposal Area (behind Slip Basin) - We have appended as Item No. 2 a summary data report prepared by Geraghty & Miller, Inc. (Geraghty & Miller) which details all the data we have concerning this SWMU and a letter report prepared by Earth Sciences Consultants, Inc. (Earth Sciences) which describes the area between the parking lot and Aloe Road. Both reports recommend that closure of these two areas be accomplished by specific methods. We would appreciate your comments on these recommendations.

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3. Polishing Lagoon, Tilton Road Pond, Piping for our Wastewater Treatment Facility - We have included within Item No. 3 the groundwater discharge monitoring reports for the Pomona plant for calendar year 1989. These reports clearly indicate that the NJDEP is regulating any releases from these SWMU's.
4. Waste Pile (west wall of glaze basin) - A soil sampling plan prepared by Geraghty & Miller is presented in Item No. 4. We will commence this plan upon your written approval to proceed.
5. Underground Effluent Pipe (piping between the glaze basin and slip basin) - We have included as Item No. 5 a discussion by Eder Associates Consulting Engineering, P.C. (Eder) describing their investigation of this piping. This discussion indicates that no releases have occurred from this piping.
6. Equalization Pump - We have attached as Item No. 6 a discussion by Eder which states that the equalization sump and associated piping did not leak and have been removed.
7. Vacuum Filter - We have attached as Item No. 7 photographs of the rotary drum vacuum filter at our industrial waste treatment facility which show that this filter is contained within a building. This building is both enclosed and isolated from the ground by a concrete slab. Furthermore, the building contains a pump sump to contain and pump any spill back into the industrial waste treatment facility. Consequently, this vacuum filter is not a SWMU that could have caused a release of wastes.
8. New Filter Press - We have included within Item No. 8 a memorandum from the Lenox Technical Center which indicates this new filter press was never installed.
9. Underground Storage Tank - We have previously submitted information prepared by Geraghty & Miller concerning this underground storage tank. It is our understanding that you will get back to us should any further information be required.



10. Area of Stressed Vegetation - We have appended as Item No. 10 a report by Earth Sciences which states this area of stressed vegetation is likely to have resulted from a high groundwater table and not from a release of hazardous wastes.

We trust this submittal clarifies our discussions and look forward to hearing from you regarding these points so as to allow you to finalize the HSWA permit. Should you have any questions in the interim, please do not hesitate to contact me at (609) 896-2800, extension 428.

Very truly yours,

LENOX, INCORPORATED

Louis A. Fantin

LAF/sh
Enclosures
cc: Irene Kropp, NJDEP